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March 15, 2023

D.C. Board of Zoning Adjustment 441 4th Street, N.W. Suite 200S Washington, D.C. 20001

Re: Board of Zoning Adjustment Case No. 18465A – St. Patrick's Episcopal

Church and Day School (the "Applicant") – BZA Application for

Modification of Significance to Private School Campus Plans – Applicant's

Prehearing Submission

Dear Members of the Board:

Please accept for filing the enclosed twenty-one (21) day pre-hearing statement by the Applicant, pursuant to 11-Y DCMR § 300.15. By the instant application, the Applicant is requesting a Modification of Significance to a previous private school campus approved by the Board (the "**Application**"). The Applicant is requesting to add two houses it owns at 4751 and 4753 Whitehaven Parkway NW (Square 1374 Lots 838 and 839) ("**Property**") into its campus and use the 4751 Whitehaven property for administrative offices and the 4753 Whitehaven property to house the School's Director of Facilities.

Since filing the initial Application, the Applicant has continued coordinating with the community and discussing the Application with Advisory Neighborhood Commission ("ANC") 3D. The Applicant is scheduled to present at ANC 3D's April meeting regarding the Application. The Applicant has also continued working with the Office of Planning ("OP") and the District Department of Transportation ("DDOT") regarding the Application. In its report dated November 29, 2021, DDOT requested an update regarding the status of compliance with Condition 1 and Conditions 14 through 17 of the original Order 18465. As set forth below in red, the Applicant has complied with these conditions:

Condition #1 – The number of students shall not exceed 485. This enrollment cap shall apply to Nursery through Grade 8 located on the Whitehaven Campus. The total number of staff and faculty shall not exceed I 05 persons. The Applicant's enrollment is consistent with this condition.

Condition #14 – The Applicant shall close the pedestrian curb cut on the Whitehaven Parkway lay-by within two years of the issuance of a certificate of occupancy reflecting the increase in student enrollment cap. The Applicant has closed this curb cut.

Mr. Frederick Hill, Chairperson March 15, 2023 Page 2

Conditions #15 – The Applicant shall install at least one inverted bicycle U-rack at the main building entrance. This bike rack has been installed.

Condition #16 – The Applicant shall install at least five inverted bicycle U-racks in the parking garage. These bike racks have been installed.

Condition #17 – The Applicant shall provide a sidewalk on the south side of Whitehaven Parkway for the portion of property immediately abutting the School. The sidewalk shall be provided within two years of issuance of a certificate of occupancy reflecting the increase in student enrollment. This sidewalk has been constructed.

The Applicant is also filing its outlines of witness testimony as <u>Exhibit A</u>. The Applicant looks forward to fully presenting this matter at the public hearing. If you have any questions, please do not hesitate to contact the undersigned at (202) 721-1106 or (202) 721-1138. Thank you for your attention to this Application.

| Sincerely, | |
|-------------------|--|
| /s/ | |
| Allison C. Prince | |
| /s/ | |
| Meghan Hottel-Cox | |

Certificate of Service

The undersigned hereby certifies that copies of the foregoing document were delivered by e-mail or sent by first class mail to the following addresses on March 15, 2023.

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Camille Comeau & Jay Hebert 1717 Foxhall Road NW Washington, DC 20007

/s/ Meghan Hottel-Cox